

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

X

GOVERNMENT EMPLOYEES INSURANCE
COMPANY, GEICO INDEMNITY COMPANY,
GEICO GENERAL INSURANCE COMPANY and
GEICO CASUALTY COMPANY

Civil Action No.:
2:20-CV-04328

Plaintiff,
-against-

**STIPULATION TO EXTEND
TIME TO ANSWER**

NASSAU QUEENS MEDICAL P.C., TONUCA BASU, M.D.,
PRADIP SEDANI, M.D., RAPAPUNCTURE MEDICAL P.C.,
GIDEON RAPAPORT, M.D., ALINA AMINOVA, L.AC.,
NATALIA BRIGHT, L.AC., YC ACUPUNCTURE, P.C.,
YURI CHOI, L.AC., GOOD CARE PHYSICAL THERAPY
P.C., SUN JOO KIM, P.T., EVERGREEN PHYSICAL THERAPY
REHABILITATION, P.C., HYUNGTAE KIM, P.T., FOUR
SEASONS CHIROPRACTIC P.C., DONG HAWN LEE, D.C.,
ASAP CHIROPRACTIC P.C., SAMUE PARK, D.C.,
MICHAEL KIMMEL, D.C., DAVINDER SINGH, MILLENNIUM
HEALTH MANAGEMENT, INC., and JOHN DOE
DEFENDANTS NOS. 1-5,

Defendants.

X

TO THE CLERK OF THE COURT AND ALL PARTIES OF RECORD:

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, as attorneys for the parties to the above entitled proceeding, that the time for Defendants GOOD CARE PHYSICAL THERAPY P.C., SUN JOO KIM, P.T. and MICHAEL KIMMEL, D.C. to Answer in response to the underlying Summons and Complaint is hereby extended up to, and including, February 8, 2021.

IT IS ALSO HEREBY STIPULATION AND AGREED that Defendants, GOOD CARE PHYSICAL THERAPY P.C., SUN JOO KIM, P.T. and MICHAEL KIMMEL, D.C., by its attorneys, waives any objections to service. For the purposes of this stipulation, facsimile signatures shall be deemed originals. The stipulation may be executed in parts.

Dated: Melville, New York
December 24, 2020



By: Robert Dash, Esq. (RED 5558)
DASH LAW FIRM, PC
Attorneys for Defendant
GOOD CARE PHYSICAL THERAPY
P.C., SUN JOO KIM, P.T. and MICHAEL
KIMMEL, D.C.
P.O. Box 280
Farmingdale, NY 11735
(631) 465-0058



By: Joshua D. Smith, Esq.
RIVKIN RADLER, LLP
Attorneys for Plaintiffs
GOVERNMENT EMPLOYEES INS. CO.,
GEICO INDEMNITY COMPANY,
GEICO GENERAL INSURANCE COMPANY
and GEICO CASUALTY COMPANY
926 RXR Plaza
Uniondale, New York 11556
(516) 357-3000